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**Ciba**



May 30, 2000

Carol Browner, Administrator  
U.S. Environmental Protection Agency  
P.O. Box 1473  
Merrifield, VA 22116  
Attn: HPV Program

Dear Ms. Browner:

Ciba Specialty Chemicals Corporation, Additives Division (HPV Registration) actively supports EPA's HPV Challenge Program. For years 1999 and 2000, we committed to sponsoring the following chemicals:

- Octadecyl 3,5-di(tert)-butyl-4-hydroxyhydrocinnamate, CAS No. 2082-79-3
- Tetrakis-(methylene-(3,5-ditertbutyl-4-hydrocinnamate)methane, CAS No. 6683-19-8
- Tris(2,4-di-(tert)-butylphenyl)phosphite, CAS No. 31570-04-4

As part of our sponsorship, we are enclosing robust summaries for these chemicals. The documents are being provided as hardcopies and electronically as PDF files. Also enclosed for each chemical is a summary table describing data adequacy and future testing. The basic testing is complete for octadecyl 3,5-di(tert)-butyl-4-hydroxyhydrocinnamate and tetrakis-(methylene-(3,5-ditertbutyl-4-hydrocinnamate)methane. For tris(2,4-di-(tert)-butylphenyl)phosphite, we will provide new test data for the "Stability in Water" component by June 1, 2001. Please contact us if you have comments or questions regarding our submissions.

Sincerely,

Richard Balcomb  
Director, Toxicology and Environmental Assessments

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